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MAY 14 2007

Remarks/Arguments:

This is a reply to the office action of November 14, 2006.

Claims 8 - 20 stand rejected as anticipated by Diamantopoulos et al. (U.S. Patent 4930504).

The claims have been amended above to better distinguish the invention from the prior art, and to overcome the objections and rejections on technical grounds. In particular, the term "bio-energy" has been removed from the claims, and proper antecedent basis has been provided for claims 18 and 19. Claim 17 has been canceled, and claim 14 has been rewritten independent form. Reconsideration of the claims is requested in view of the above changes and the following remarks.

This invention is distinguished from the references in that it provides multiple arrays (claim 8) of light emitting devices. The arrays are independently operable (claim 8): in particular, they can be turned on or off as needed (claim 10) and different wavelengths may be selected simultaneously (claim 12).

The inventive device further includes protocols (claim 14) illustrated in Table I, which specify predetermined wavelength, intensity, dosage and treatment values for selected different parts of the body. Each array is independently capable (claim 18) of receiving one of the preset protocols from a central microprocessor, so that different parts of the body can be treated at once.

Diamantopoulos discloses a treatment apparatus including a cluster probe, containing several different light sources. This was a significant improvement in the art at the time; however, Diamantopoulos did not disclose an apparatus having multiple cluster probes (which the present applicant calls "arrays"), much less multiple arrays which

are independently operable.

Moreover, none of the references discloses a device which includes multiple protocols (preset treatment schedules) for different parts of the body, as recited in claim 14. Nor does any reference disclose that plural protocols may be implemented simultaneously by different arrays, as recited in claim 18. The advantage of this arrangement is that different parts of the body, which may require remarkably different treatment parameters, may be treated simultaneously, reducing the time required for the patient, improving treatment reliability and simplifying the task of the practitioner.

Lai et al. does not overcome the deficiencies of Diamantopoulos as a reference. It shows a device in which plural single-light elements 20a, 20b etc. are operated by a common controller 40. There is no suggestion that the controller would or could implement different protocols for different parts of the body, or that the light elements 20a, 20b etc. would be applied to different parts of the body at the same time. Claim 14 is thus deemed allowable for its recitation:

"said light sources being arranged in multiple independently operable arrays of both visible and invisible light emitting devices for providing a harmonizing effect on the body by balancing all the energy centers of the body wherein each of said light source arrays is controlled automatically by a respective one of plural preset protocols, each said protocol defining wavelength, intensity, dosage and treatment values suitable for treatment of a different part of the body."

We believe that the claims now presented distinguish the invention from the prior art, and that the application is now in proper form for allowance.

Respectfully submitted,



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May 14, 2007